

CARLBERG et al
Serial No. 09/935,759

Atty Dkt: 2380-188
Art Unit: 2664

REMARKS/ARGUMENTS

Reexamination of the captioned application is respectfully requested.

A. SUMMARY OF THIS AMENDMENT

By the current amendment, Applicants basically:

1. Add new independent claims 71 (apparatus) and 72 (method).
2. Amend claims 1 – 3 to depend on new independent claim 71.
3. Amend claims 36 – 38 to depend on new independent claim 72.
4. Amend claim 22 and 25 to depend from claim 3.
5. Amend claim 57 to depend from claim 38.
6. Editorially amend claims 10 and 45.
7. Cancel claims 21, 28 – 35, 56, and 63 – 70 without prejudice or disclaimer.
8. Respectfully traverse all prior art rejections.

B. PATENTABILITY OF THE CLAIMS

Claims 1-22, 24-32, 34-57, 59-67 and 69-70 stand rejected under 35 USC §102(e) as being anticipated by U.S. Patent 6,430,189 to Juntumaa et al. Claims 23, 33, 58 and 68 stand rejected under 35 USC §103(a) as being unpatentable over U.S. Patent 6,430,189 to Juntumaa et al in view of U.S. Publication 2002/0105969 to Benedyk et al as applied to the claims above. All prior art rejections are respectfully traversed for at least the following reasons.

U.S. Patent 6,430,189 to Juntumaa et al. illustrates (in Fig. 1) a prior art configuration wherein call control units 1 – N of a digital exchange communicate over a message bus. Juntumaa's alleged improvement is to have units 1 – N instead interface to and communicate through an ATM switch (see Fig. 4). Juntumaa thereby aims to integrate internal traffic (of the units 1 – N) with subscriber traffic to offer "the best

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possible connection quality for different applications” when internal traffic and subscriber traffic use common resources” (col. 4, lines 48+).

In either Juntumaa configuration – the system of prior art Fig. 1 or Fig. 4 – U.S. Patent 6,430,189 to Juntumaa et al. fails to teach or suggest the subject matter of Applicants’ claims. Juntumaa’s “units” are not part of a processor cluster over which a connection handling functionality is distributed, and particularly not a connection handling functionality which facilitates execution, on different processors, of software objects for corresponding different user plane resources. The user plane resources are recited in independent claims 71 and 72 as comprising one or more of link resources and end system resources involved in a bearer service connection¹.

In being involved in bearer service connections, the claimed user plane resources resemble more the line interfaces of Juntumaa’s exchange, and thus are involved in subscriber traffic. Clearly Juntumaa’s units are executing applications for internal node administrative purposes, such as intra-node signaling, finance charging, statistics gathering, etc. (col. 1, lines 33+). There is no indication that Juntumaa’s units have software objects corresponding to plural user plane resources, much less any teaching or suggestion that software objects for different user plane resources could be distributed to different units of the Juntumaa system. Nor do any secondarily applied references compensate for or have any proper basis for combinability with Juntumaa.

¹ That Applicants’ connection handling functionality is distributed to facilitate execution, on different processors, of software objects for corresponding different user plane resources is supported, e.g., by page 18, lines 9+ of the specification. Concerning software objects per se, see, e.g., page 15, lines 23+, for example. One or more of link resources and end system resources involved in a bearer service connection is discussed, e.g., on page 11, lines 27+. These are just example citations of concepts manifest throughout the specification.

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C. MISCELLANEOUS

In view of the foregoing and other considerations, all claims are deemed in condition for allowance. A formal indication of allowability is earnestly solicited.

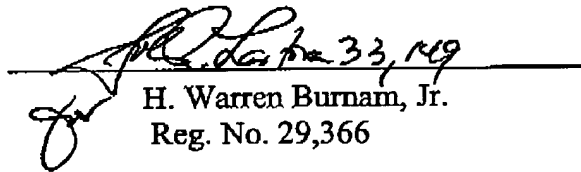
The Commissioner is authorized to charge the undersigned's deposit account #14-1140 in whatever amount is necessary for entry of these papers and the continued pendency of the captioned application.

Should the Examiner feel that an interview with the undersigned would facilitate allowance of this application, the Examiner is encouraged to contact the undersigned.

Respectfully submitted,

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By:


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